

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE CITY OF PHILADELPHIA, MAYOR  
AND CITY COUNCIL OF BALTIMORE,

Plaintiffs,

vs.

BANK OF AMERICA CORP., *et al.*,

Defendants.

Case No. 19-cv-1608(JMF)

**STIPULATION AND (PROPOSED) ORDER REGARDING VOLUNTARY  
DISMISSAL OF DEFENDANT JPMORGAN CHASE & CO.**

WHEREAS, on May 31, 2019, Plaintiffs The City of Philadelphia and the Mayor and City Council of Baltimore filed a consolidated complaint in the above-captioned action (the “Consolidated Complaint”);

WHEREAS, the Consolidated Complaint names JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., and J.P. Morgan Securities LLC as defendants;

WHEREAS, undersigned counsel for Defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., and J.P. Morgan Securities LLC have represented that Defendant JPMorgan Chase & Co. is a holding company and did not, at any point during the timeframe alleged in the Consolidated Complaint, engage in the business of remarketing variable rate demand obligations (“VRDOs”), providing letters of credit in connection with VRDOs, or managing money market funds (“MMFs”) investing in VRDOs.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiffs hereby voluntarily dismiss all claims against Defendant JPMorgan Chase & Co. without prejudice to their inclusion in this case at a later time should evidence arise in discovery or otherwise that reveals information contrary to the above-referenced representations of counsel, and the Parties agree that any statute of limitations, statute of repose, or other time-related defense or claim shall be tolled as to Defendant JPMorgan Chase & Co. as if the claims were filed on February 20, 2019.

DATED: New York, New York  
June 6, 2019

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IT IS SO ORDERED.

DATED: \_\_\_\_\_

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JESSE M. FURMAN  
United States District Judge